

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

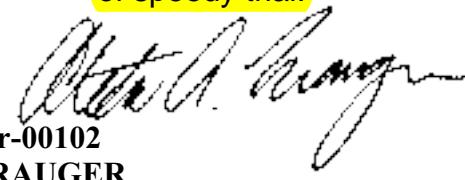
Motion GRANTED
conditioned upon the
timely filing of a waiver
of speedy trial.

UNITED STATES OF AMERICA

v.

KENNETH JOHNSON

No. 3:13-cr-00102
JUDGE TRAUGER



MOTION TO CONTINUE

Comes now the Defendant, Kenneth Johnson, by and through undersigned counsel and hereby respectfully moves this Honorable Court to continue the trial date and all associated deadlines for approximately sixty (60) days. For cause, undersigned counsel would show the following:

- (1) Mr. Johnson was arraigned approximately four (4) months ago, on June 28, 2013. (See docket entries 13, 15).
- (2) Since that time, undersigned counsel has been conducting an investigation of the case. That investigation is not complete.
- (3) Also since that time, the parties have engaged in meaningful plea negotiations. Those negotiations are not complete.
- (4) Undersigned counsel believes that further negotiations would be fruitful for the parties. If fruitful, of course, the Court would be spared the expense and time of a trial.
- (5) Undersigned counsel has been in contact with AUSA Clay Lee. Mr. Jones agrees with this motion.